

Exhibit A

(Proposed Additional Agreed and Disputed Stipulations of Fact)

1. With respect to the Subject Vehicles¹ and the Ignition Switch Defect, the facts and circumstances of the incidents involving the Plaintiffs covered by the Complaints,² including matters of causation or fault, have not yet been determined or adjudicated by a judge or jury, and such facts and circumstances are not undisputed.
2. With respect to the Subject Vehicles and the Ignition Switch Defect, the substance of any direct or indirect communications by or on behalf of Old GM, or by any of its employees, agents or representatives, to any of the Plaintiffs covered by the Complaints, or to any of their respective agents or representatives, with respect to the incidents cited in the Complaints, has not yet been established by a judge or a jury, and the substance and/or effect of such communications are not undisputed.
3. With respect to the Subject Vehicles and the Ignition Switch Defect, the substance of any direct or indirect communications by or on behalf of any of the Plaintiffs covered by the Complaint, or by any of their respective agents or representatives, to Old GM, or to any of its employees, agents, or representatives, with respect to the incidents cited in the Complaints, has not yet been established by a judge or a jury, and the substance and/or effect of such communications are not undisputed.
4. With respect to any litigation between any of the Plaintiffs covered by the Complaints, on the one hand, and Old GM, on the other hand, that was pending prior to July 10, 2009, concerning an incident involving a Subject Vehicle and the Ignition Switch Defect in which discovery responses or deposition testimony was given by one party to the other prior to July 10, 2009, the veracity, responsiveness, or candor of such responses or testimony has not yet been established through motion practice or by way of adjudication, and the veracity, responsiveness, or candor of such responses or testimony is not undisputed.

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed in the *Agreed And Disputed Stipulations Of Fact Pursuant To The Court's Supplemental Scheduling Order, Dated July 11, 2014*, filed on August 8, 2014 [Dkt. No. 12826] and Exhibits A-D attached thereto (the "**Original Stipulations of Fact**").

² "Complaints" shall mean the complaints listed in the Pre-Closing Accident Motion to Enforce.